

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Patrick Walsh,)	
)	
Plaintiff,)	
)	Case No.: 08 C 1717
v.)	
)	Judge Hart
Credit Protection Association, L.P.,)	
)	Magistrate Judge Keys
Defendant.)	
)	

MOTION FOR ENLARGEMENT OF TIME

Defendant, Credit Protection Association, L.P., by its attorney Justin M. Penn, pursuant to Federal Rule of Civil Procedure 6(b) respectfully request that this court grant a 21-day enlargement of time to file a responsive pleading to the plaintiff's Complaint, and in support thereof, states as follows:

1. Plaintiff's Complaint purports to state claims under the Fair Debt Collection Practices Act against the defendant.

2. Plaintiff's Complaint was filed on March 24, 2008, and defendant was served on April 2, 2008. Defendant's responsive pleading is due April 22, 2008.

3. Defendant has retained defense counsel who has filed an Appearance concurrently with the instant motion. Counsel for the defendant has contacted counsel for the plaintiff to discuss possible early resolution of this case.

4. Defendant hereby requests an additional 21 days to answer or otherwise plead. This time is not meant for purposes of unnecessary delay and will not prejudice

any party in the litigation. This time is necessary to analyze the pleading and prepare the appropriate response to the plaintiff's claims and fully explore early settlement.

WHEREFORE, Defendant, Credit Protection Association, L.P. respectfully requests that this Court grant a 21-day enlargement of time, up to and including, May 13, 2008, to file a responsive pleading to the plaintiff's Complaint.

Respectfully submitted,

Credit Protection Association, L.P.

By: s/Justin M. Penn
One of the Attorneys for Defendant

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CERTIFICATE OF SERVICE

I, the undersigned, certify that I filed this Notice and the document referenced herein through the Court's ECM/CF system, which will cause electronic notification of this filing to be sent to all counsel of record on April 21, 2008.

s/Justin M. Penn

Justin M. Penn